

EXHIBIT 11

DATE: **March 29, 2017**

TO: Roku Inc.

12980 Saratoga Avenue, Suite D

Saratoga, California 95070

Attn: Copyright Agent

E-mail: copyright@roku.com

I declare UNDER PENALTY OF PERJURY that:

1. I am the owner, or an agent authorized to act on behalf of the owner, which owner's name is

Komanda LLC and NTV America ("IP Owner"), of the following copyrighted work.

Identify, in sufficient detail, the copyrighted work that you claim has been infringed upon, including providing any registration number or other identification, if available. Attach applicable documents, if any.

See the attached letter from David Guerrero Liston for information about Komanda LLC's and NTV America's respective copyrighted works (the "Letter")

2. I have a good faith belief that the content described below and being made available to end users of the Company's products is not authorized by the IP owner, its agent, or the law, and therefore infringes the IP Owner's rights:

Identify the content that you claim is infringing the copyright identified above.

See the attached Letter.

Where does the alleged infringing material appear? Please provide sufficient information to help us locate the content you are reporting.

The infringing materials appear on the Roku channels with the following access codes: PMR38 and FLVM3.

See the attached Letter for additional information.

Please describe how the content infringes your or the IP owner's rights (this question may assist us with processing your claim and eliminate the potential need for follow-up questions should your notice be unclear).

The content is infringing Komanda LLC's and NTV America's respective rights by distributing their respective copyrighted programming without authorization.

See the attached Letter for additional information.

Identify, if possible, information sufficient to permit the Company to notify the channel application developer and/or service provider of the allegedly infringing content.

See Schedule 1 in the attached Letter.

3. I acknowledge that this Notice, including my contact information, may be provided to the channel application developer and/or service provider associated with the alleged infringing content.

4. I may be contacted as follows:

My Name: **David Guerrero Liston, Esq.**

My Telephone: **(212) 822-0160**

Company or Other IP Owner (if different from me):

**Lewis Baach pllc Kaufman Middlemiss
The Chrysler Building
405 Lexington Avenue, 62nd Floor
New York, New York 10174**

Email: **david.liston@lewisbaach.com**

Check one of the boxes below.

The information I have provided in this statement is accurate.

I agree: ☒

I disagree: ☐

Electronic or Physical Signature:

/s David Guerrero Liston



David Guerrero Liston
212 822 0160
david.liston@lewisbaach.com

March 29, 2017

VIA EMAIL

Roku, Inc.
Attn: Douglas Weiss, Esq.
Director, Business & Legal Affairs
150 Winchester Circle
Los Gatos, California 95032

Re: Notice of Copyright Infringement Through Roku Platform

Dear Mr. Weiss:

We represent Komanda LLC, (“Komanda”) and NTV America (“NTV America”) (collectively, the Notifying Parties). We write to notify you of entities that are using Roku, Inc. (“Roku”)’s platform to distribute Komanda’s and NTV’s content without authorization.

Komanda is the worldwide copyright holder for certain content that is shown on Russian language television, including content that is shown on the Russian television network, Channel One. Among the programs to which Komanda is the copyright holder are the Russian television programs: Modny Prigovor (Модный Приговор) and Kontrolnaya Zakupka (Контрольная Закупка) (the “Komanda Copyrighted Content”).

NTV America is the exclusive copyright holder in the United States for certain content that is shown on Russian language television, including content that is shown on the Russian television network, NTV. Among the programs to which NTV America is the copyright holder in the United States is the Russian television program, Sud prisyazhnykh (Суд присяжных) (the “NTV Copyrighted Content”).

Komanda and NTV have launched an investigation to identify parties who are streaming their respective content without authorization. As a result of that investigation, the Notifying Parties have identified one entity, as set forth in Schedule 1 to this letter (the “Pirate”) who is distributing, without authorization, the Komanda Copyrighted Content and the NTV Copyrighted Content.

The Pirate is rebroadcasting numerous Russian TV networks, including Channel One and NTV America on its respective Roku channels. The Pirate distributes the programming through the Roku

platform to a subscriber through the live rebroadcast of the Russian TV networks, the archived rebroadcast of the Russian TV networks, and/or through a video on demand library.

Attached to this letter is screenshots that demonstrate the Pirate's use of the Roku platform to distribute the Komanda Copyrighted Content and the NTV Copyrighted Content.

Komanda has not authorized the Pirate, directly or indirectly, to distribute the Komanda Copyrighted Content in any manner whatsoever, including without limitation, the right to distribute the Komanda Copyrighted Content through any web streaming platform such as the Roku platform.

NTV has not authorized the Pirate, directly or indirectly, to distribute the NTV Copyrighted Content in any manner whatsoever, including without limitation, the right to distribute the NTV Copyrighted Content through any web streaming platform such as the Roku platform.

As Komanda and NTV did not authorize the Pirate to distribute the content, it is reasonable to assume that the Pirate is also distributing the content of other rightsholders without their authorization.

In light of the evidence that each of the Pirate is streaming the Komanda Copyrighted Content and the NTV Copyrighted Content without the authorization of Komanda or NTV, we respectfully request that Roku immediately disable the Pirate's channels on the Roku platform as well as on any devices or services offered by Roku.

Please note, that the Pirate operated the Roku channels TVTEKA, INVID9, and DTV12, which were identified in my March 13 and March 20 DMCA notices to Roku. The Pirate has circumvented the removal of its Roku channels INVID9 and DTV12 by creating 2 new channels with Roku access codes PMR38 and FLVM3.

The Pirate's circumvention of Roku's removal of its channels has been flagrant. As you can see in the attached screenshots, the Pirate merely changed the Roku access codes from the disabled channel codes to the new channel codes in the FAQ on the Pirate's website (<https://tvteka.com/faq/devices/roku>) providing its subscribers with instructions about accessing its Roku channel. The new channels have the same name (TVTEKA) and logo as the original channels.

The Pirate's new channels, which are the subject of this DMCA Notice, are also streaming content from Komanda and NTV. The screenshots attached to this letter were taken on March 28, 2017 from the Pirate's channel with access code FLVM3, and show the Pirate continuing to distribute the Komanda Copyrighted Content and the NTV Copyrighted Content.

Based on these screenshots, which demonstrate the Pirate's circumvention of the removal of the offending channels and the Pirate's continued infringement, we request that you immediately remove the Roku channels with the access codes PMR38 and FLVM3.

In light of the Pirate's egregious actions, we also request that you disable all channels associated with the developer account(s) that distributed the channels with the access codes TVTEKA, INVID9, DTV12, PMR38, or FLVM3 and that you permanently terminate their accounts as being repeat offenders.

We would appreciate if you provide us with confirmation that Roku has taken the requested actions to prevent the continued use of Roku's services to facilitate the Pirate's infringement of the Komanda Copyrighted Content and the NTV Copyrighted Content.

Please do not hesitate to contact me at 212-822-0160 or david.liston@lewisbaach.com if you have any questions or if there is any additional information we can provide to you.

Respectfully submitted,

A handwritten signature in blue ink, reading "David Guerrero Liston". The signature is fluid and cursive, with a long horizontal flourish extending to the left.

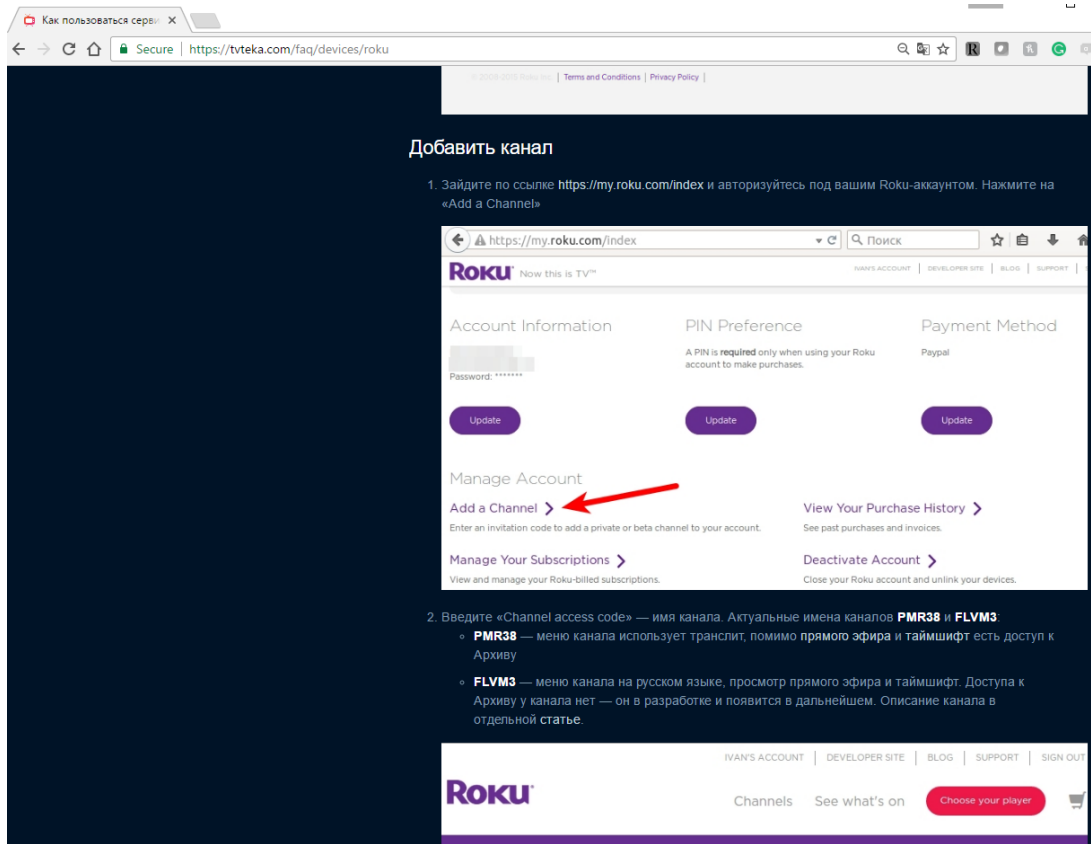
David Guerrero Liston

cc: Alex G. Patchen
Anthony M. Capozzolo
Ari J. Jaffess

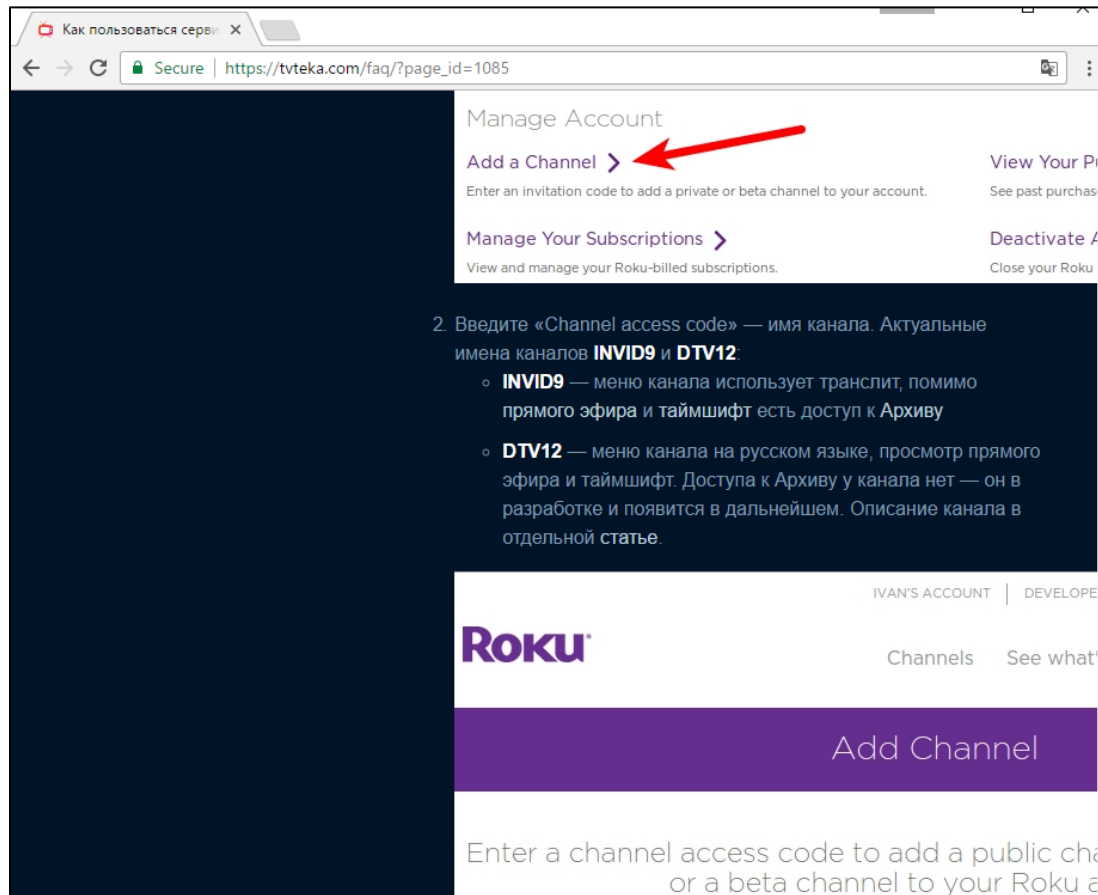
Schedule 1

1. TVTEKA
Roku Channel Access Codes – PMR28, FLVM3
Original Roku Channel Access Codes – INVID9, TVTEKA,
DTV12
c/o ARIEL IMPEX LP
Franz-Joseph-Str. 11
80801 Munich, Germany

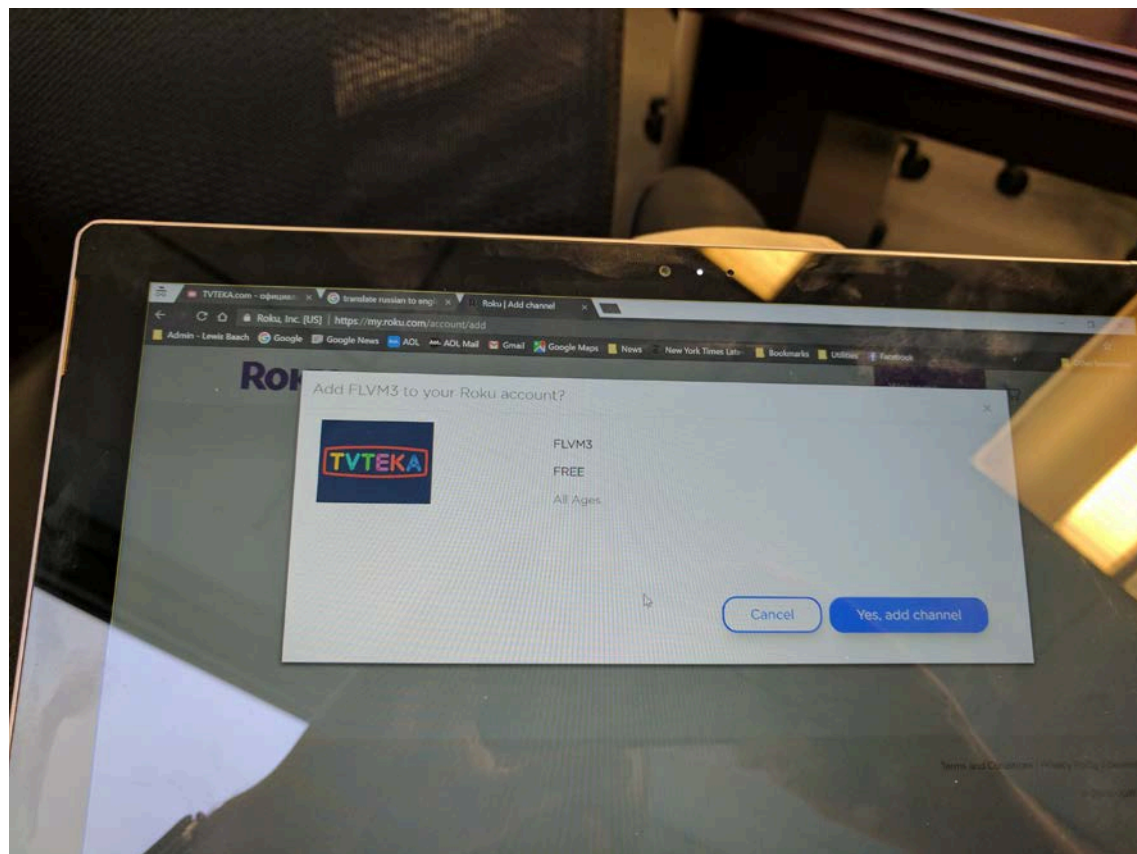
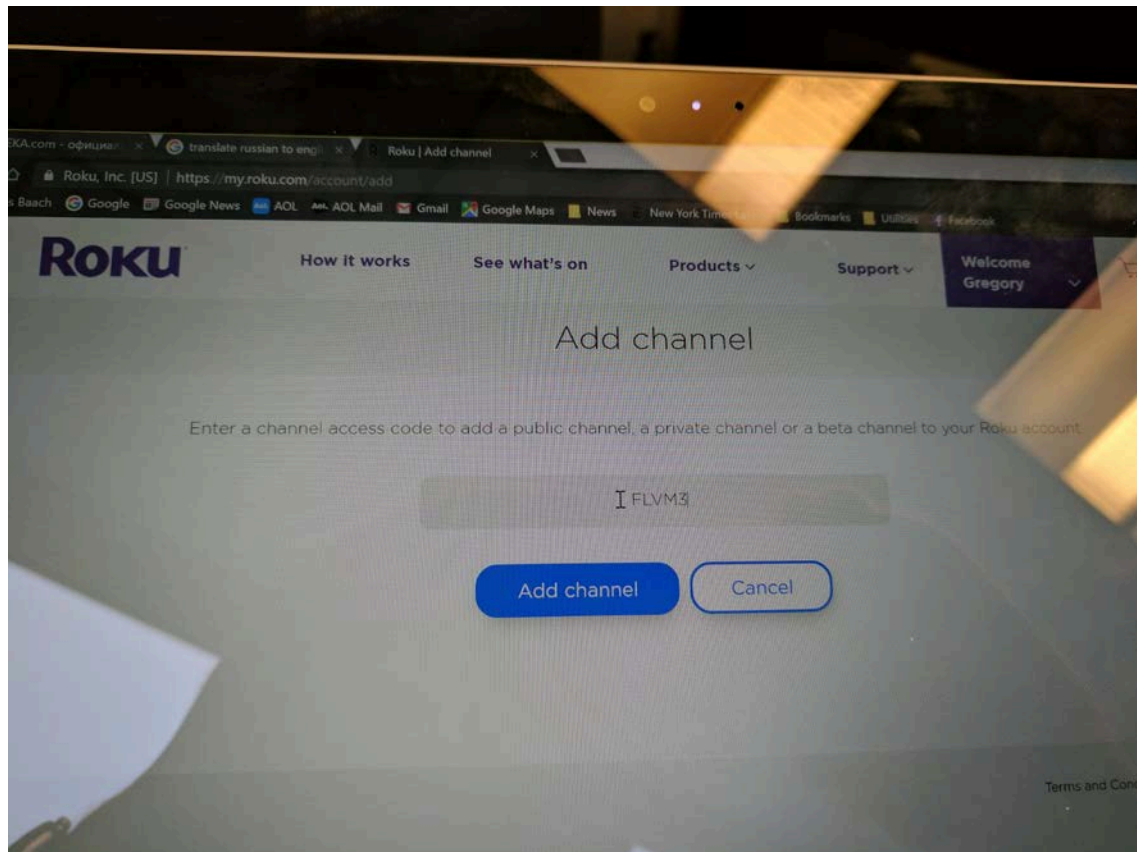
TVTEKA Website – Changed to provide new Roku channel access codes in response to DMCA Notice

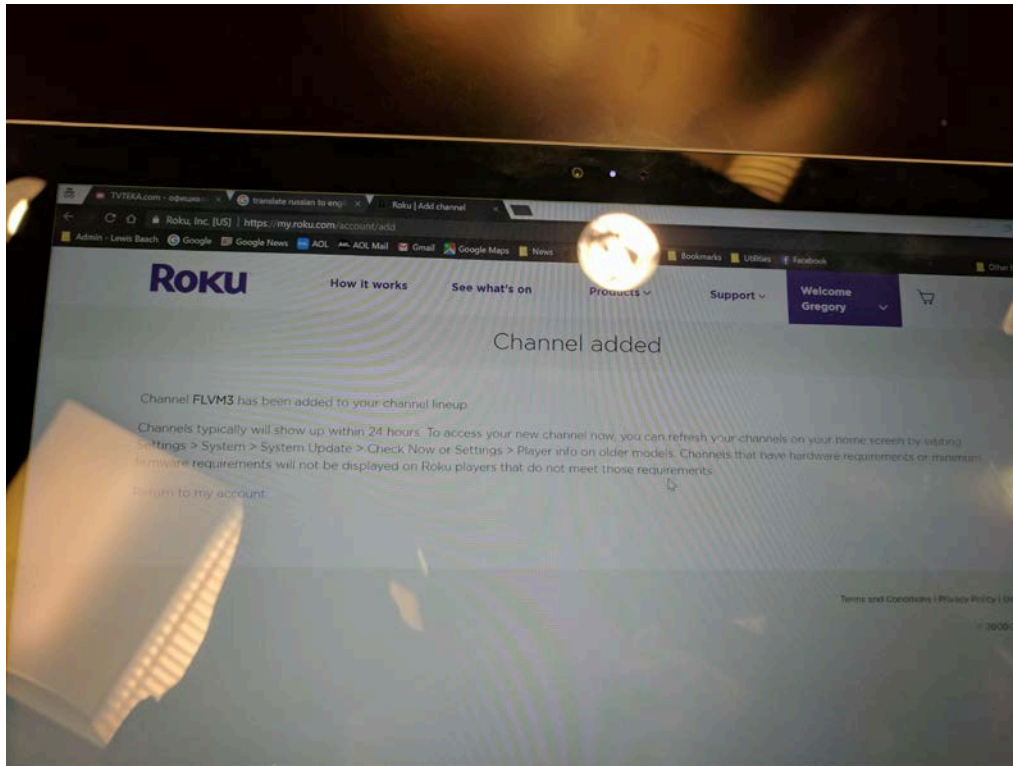


Original TVTEKA Website

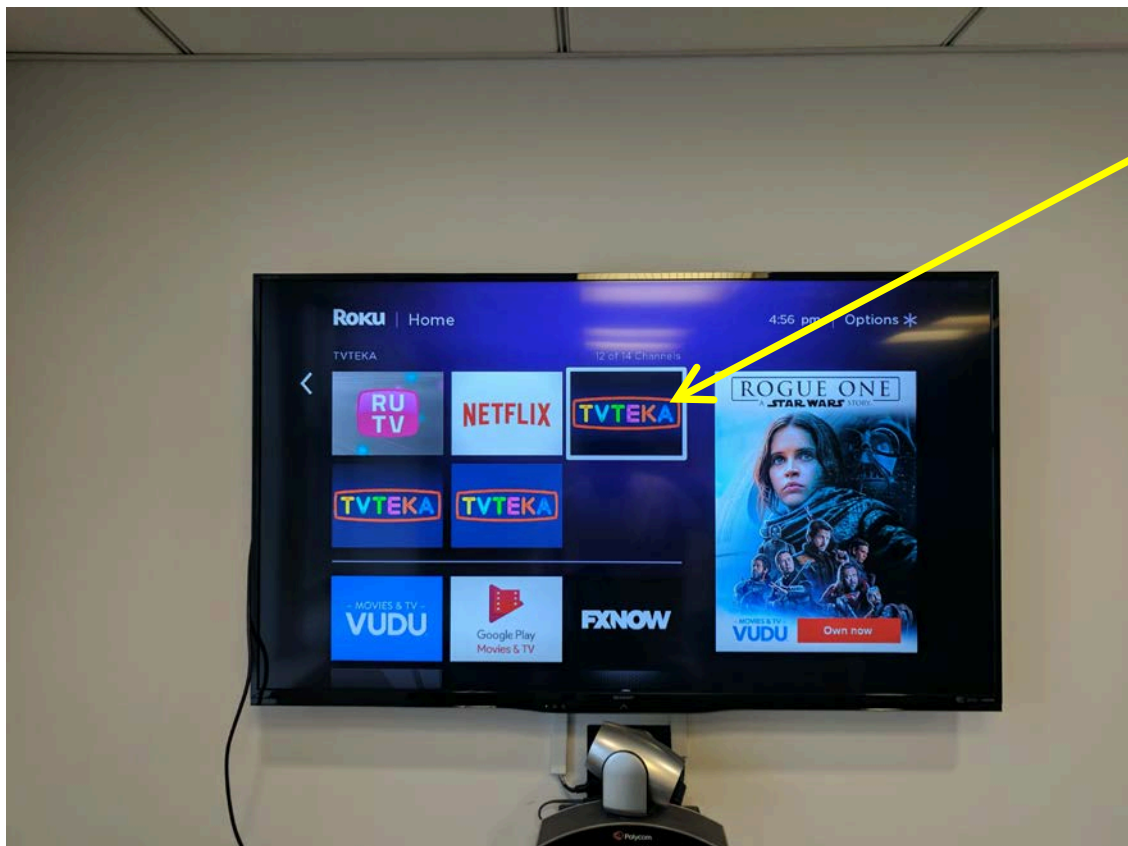


Adding TvTeka with channel code FLVM3



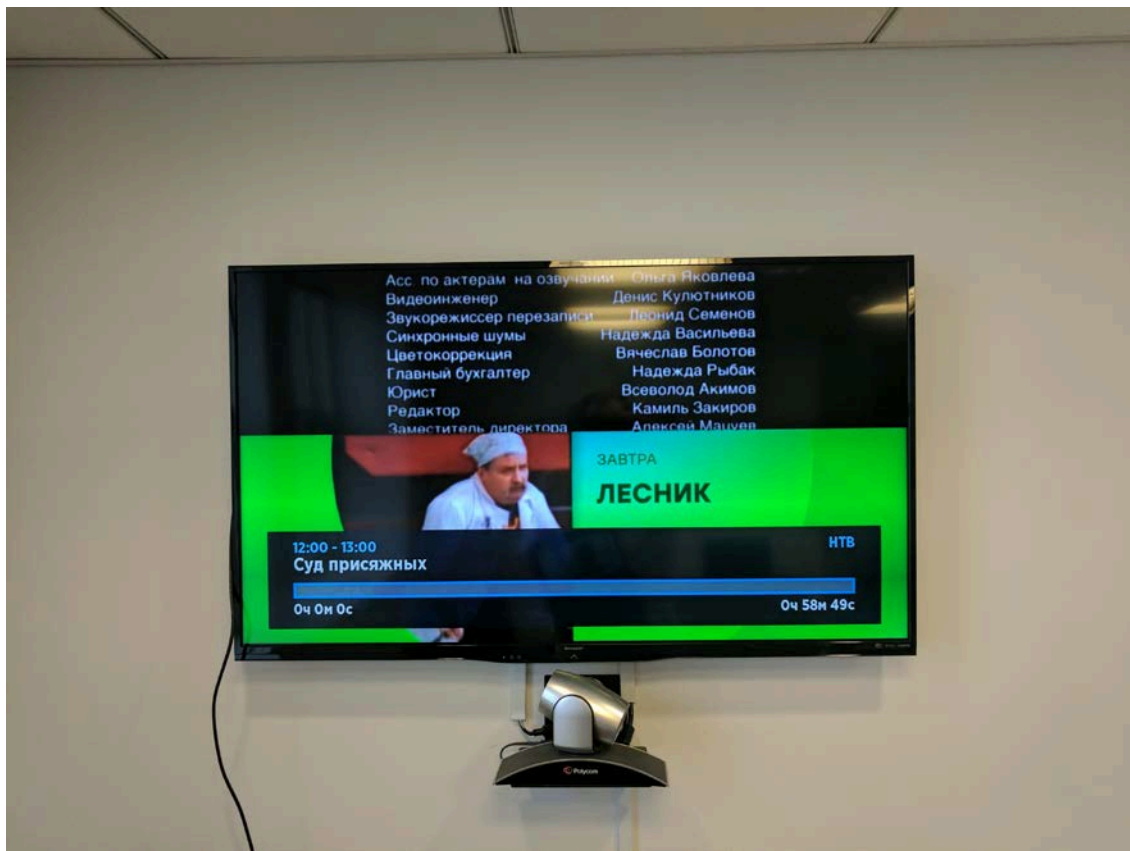
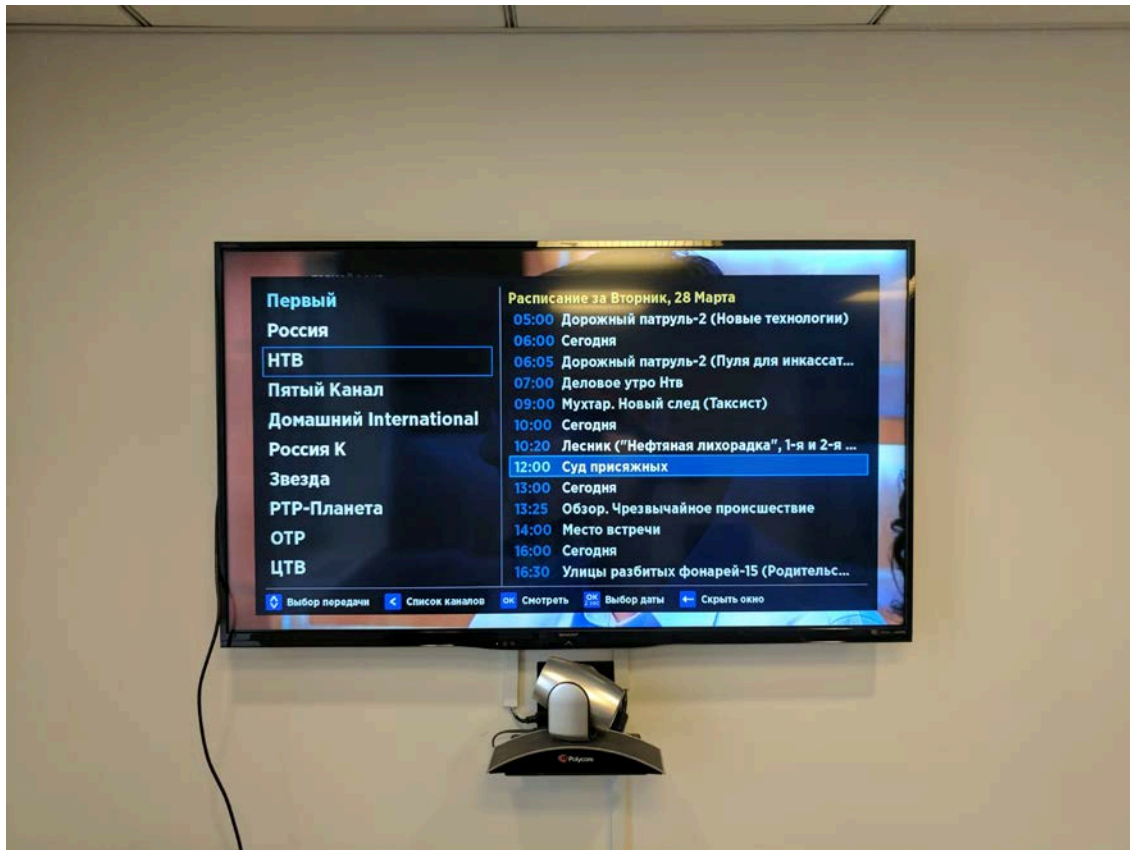


Showing new (and old) TvTeka

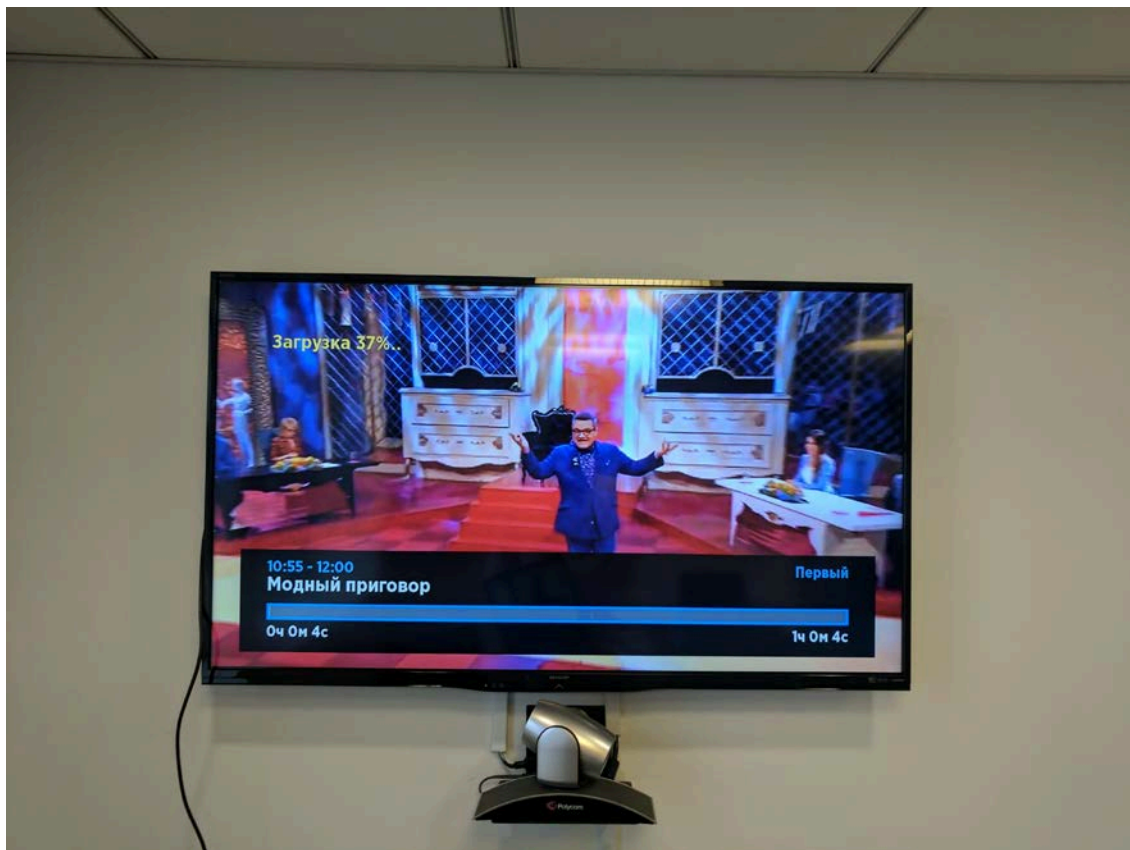
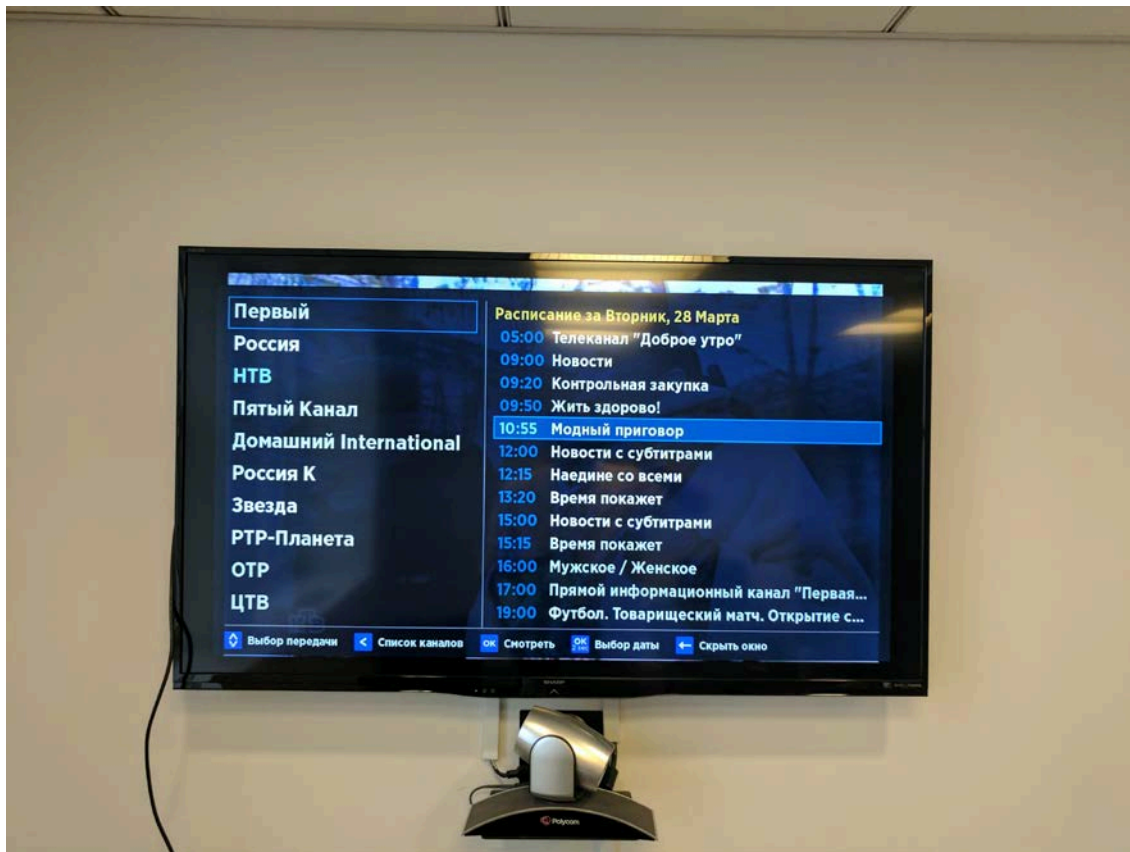


TVTeka
Roku Access Code –
FLVM3

March 28, 2017 – Sud prisyazhnykh (Суд присяжных) – NTV Live Broadcast



March 28, 2017 – Modny Prigovor (Модный Приговор) – Live Broadcast



March 28, 2017 – Kontrolnaya Zakupka (Контрольная Закупка) – Archived Broadcast

